

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA AND STATES
OF THE UNITED STATES, ex. Rel.
PATRICK DONOHUE

Plaintiff-Relator

VS.

RICHARD CARRANZA, in his official capacity
as the Former Chancellor of New York City
Department of Education, et al

Defendants

CIVIL ACTION NO:
1:20-cv-5396 (GHW)

JUNE 30, 2022

**DEFENDANTS STAMFORD BOARD OF EDUCATION AND DR. TAMU LUCERO'S
NOTICE OF MOTION TO DISMISS PURSUANT TO FEDERAL RULES OF CIVIL
PROCEDURE 12(b)(2), (3), AND (6)**

PLEASE TAKE NOTICE, that, upon the attached Memorandum of Law, and all the proceedings heretofore had herein the Defendants, Stamford Board of Education and Dr. Tamu Lucero will move before the Honorable Stewart D. Aaron, U.S.M.J. of the United States District Court for the Southern District of New York, at the United States District Courthouse, located at 500 Pearl Street, New York, NY 10007, at a time and place to be scheduled by this Court, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure and Local Civil Rule 11.1 granting Defendants' Motion to Dismiss Plaintiffs' Second Amended Complaint.

THE DEFENDANTS
STAMFORD BOARD OF EDUCATION AND
TAMU LUCERO

By: /s/Ryan P. Driscoll
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CERTIFICATION OF SERVICE

I hereby certify that on the date hereon, a copy of the foregoing motion was filed electronically [and served by mail on anyone unable to accept electronic filing]. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system [or by mail to anyone unable to accept electronic filing]. Parties may access this filing through the Court's system.

/s/ Ryan P. Driscoll
Ryan P. Driscoll